

**UNITED STATES OF AMERICA**

**V.**

**[1] CHESTER GALLAGHER**

[2] HEATHER IDONI

[3] CALVIN ZASTROW

[4] COLEMAN BOYD

[6] PAUL VAUGHN

[7] DENNIS GREEN

Comes now the Defendants, Chester Gallagher, Heather Idoni, Calvin Zastrow, Coleman

Boyd, Paul Vaughan and Dennis Green, by and through undersigned counsel, and moves this Court to allow the Defendants to file a Surreply to the Government's Reply in Support of the Government's Motion to Preclude. (D.E. 412 and 359) The Defendants believe that the Government's Reply misstates the Defendants' position on an issue of particular relevance and importance to the Court's determination. The proposed Surreply has been attached an exhibit below.

Respectfully submitted,

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing Motion was filed electronically and served on the following by the EF/CME electronic filing system:

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This the 28<sup>th</sup> day of December 2023.

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